

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE STANDARD CHANGES, 2012

DOCKET NO. N2012-1

INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES POSTAL  
SERVICE [DBP/USPS-1 through 11]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

December 13, 2011

Respectfully submitted,

N20121A1

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-1 Various references have been made in this proceeding to a time of day with a numerical value of 12 or 12:00.

- [a] Does 12 AM / 12:00 AM refer to noon or midnight?
- [b] Does 12 PM / 12:00 PM refer to noon or midnight?
- [c] Does 12 midnight have the day associated with it of the same as one minute earlier [11:59 PM] or one minute later [12:01 AM]?
- [d] Have the above standards been followed consistently in this Docket?

DBP/USPS-2 [a] Before the implementation of this Docket, please indicate the percentage of First-Class Mail that is destined for overnight delivery, for 2-day delivery, for 3-day delivery, for 4- or more day delivery?

[b] Provide the similar data for the expected percentages that will exist after the implementation of this Docket.

DBP/USPS-3        [a]     For First-Class Mail, what percentage of the mail currently destined for overnight delivery will change to 2- or more day delivery?

[b]     Will any First-Class Mail currently destined for overnight delivery change to 3- or more day delivery?

[c]     If so, please identify the ZIP Code pairs that will change from overnight to 3- or more day delivery.

DBP/USPS-4        [a]     Please confirm, or explain if you are unable to confirm, that currently the criteria for First-Class Mail the 2-day vs. 3-day delivery for the continental 48 states is that 2-day delivery will be where the calculated drive time from the originating plant to the destinating ADC is 12 hours or less and for 3-day delivery is 12.05 hours or more [that is beyond the currently overnight area].

[b]     Please advise the 2-day vs 3-day criteria that are being proposed in this Docket.

DBP/USPS-5        Please advise the changes that are being proposed for First-Class Mail to, from, or within Alaska, Hawaii, Puerto Rico, US Virgin Islands, Guam, American Samoa, and the other Pacific areas in the 969 ZIP Code.

DBP/USPS-6        [a]     Please advise what changes are being proposed for delivery standards for Priority Mail since the changes in First-Class Mail being proposed in this Docket will transition mail to Priority Mail particularly in the overnight area.

[b]     Same as subpart [a] for Express Mail.

[c]     Please provide timelines for the processing of this mail to achieve the delivery standards.

DBP/USPS-7        [a]     Please advise any changes that have been made in the EXFC program in the last seven years.

[b]     Please advise any changes in the EXFC program that are presently being considered.

[c] Are there any plans being made to discontinue or reduce the EXFC program and if so, please explain?

DBP/USPS-8 [a] For the initial processing of mail arriving at a processing center, please advise the time frame under the present scenario vs. under the proposed scenario. If this is different for different categories of mail, please explain and provide data for each.

[b] Under the present and proposed scenarios for the initial processing of mail at a processing center, please provide the percentage of the total volume is being processed in each hour of the operation [for example if the time frame is 5 PM to 10 PM there will be five one-hour slots and each will have a percent associated with it and all five percentages will add up to 100%].

DBP/USPS-9 [a] Please discuss the abilities that will exist, if any, to achieve next day delivery of First-Class Mail including, but not limited to, dropping off presorted mail at a destinating processing center prior to 8 AM.

[b] Will it be possible to drop off mail at a local retail window and/or local lobby drop and/or a local blue collection box and have it manually processed for delivery on or before the next day and if not, why not?

DBP/USPS-10 Please provide a listing of those city delivery offices that do not have a 5 PM or later collection time on weekdays at the main office and classified stations or branches at both the lobby and blue collection box at the facility. This listing should include the following data:

[1] Facility name, state, and ZIP Code

[2] Final weekday collection time in the lobby

[3] Final weekday collection time at the blue collection box at the facility

[4] The time of the final dispatch from that facility to the processing center or to another facility for dispatch to the processing center.

[5] Whether the District Manager has granted a waiver of the 5 PM time

DBP/USPS-11      Please provide a listing of all conditions under which mail which is collected by a city delivery carrier, a rural delivery carrier, or an HCR delivery carrier from customers along their route on a given day [both weekdays and Saturdays] will not be dispatched to the processing center for processing with a Day-0 of the same day as the day the carrier collected the mail from the customer.